

NEAD LLC

October 27, 2017

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

**Re: National Emergency Address Database Privacy and Security Plan
PS Docket No. 07-114**

Dear Ms. Dortch:

On October 26th, Matthew Gerst, representing the NEAD, LLC, met with Louis Peraertz of Commissioner Mignon Clyburn's Office to discuss the item addressing the National Emergency Address Database Privacy and Security Plan¹, which is currently on circulation. During the meeting, Mr. Gerst discussed the contents of the attached slide deck.

Specifically, Mr. Gerst discussed the NEAD LLC's ongoing efforts to operationalize the NEAD Platform to meet the reference point requirements described in the Commission's rules.² Mr. Gerst also discussed how the Plan was developed and designed consistent with the requirements and spirit of the Commission's *Wireless E911 Location Accuracy Requirements Fourth Report and Order* (Order).³

Wireless carriers' ability to utilize the NEAD to produce dispatchable location information for wireless calls to 9-1-1 is contingent on prompt Commission approval of the Plan.⁴ For this reason, Mr. Gerst encouraged the Commission to approve the Plan expeditiously and provide the certainty needed to help ensure that the NEAD can remain on-track to support the carriers' ability to use the NEAD to produce dispatchable location information for wireless calls to 9-1-1.

¹ Ltr. from Tom Power and Tom Sawanobori of NEAD LLC, Joan Marsh of AT&T, Charles McKee of Sprint, Steve Sharkey of T-Mobile and Will Johnson of Verizon, PS Dkt. 07-114 (submitted Feb. 3, 2017) (NEAD Privacy & Security Plan).

² See 47 C.F.R. 20.18 (i) (2) (ii) (C)-(D).

³ See *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Fourth Report and Order, 30 FCC Rcd 1259 ¶ 69 (2015) (Order); see also 47 C.F.R. § 20.18 (i)(4)(iii).

⁴ See Order ¶ 70.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/ Matthew B. Gerst

Matthew B. Gerst
NEAD, LLC

cc Louis Peraertz

Wireless 9-1-1 Location Accuracy: *Progress on the Road Towards Realizing the FCC's 4th Report & Order*

October 2017

Presented to the Office of FCC Commissioner Mignon Clyburn

Wireless 9-1-1 Location Accuracy:

A New Course to Harness Commercial Solutions

Wireless 9-1-1 is Harnessing Available Technologies

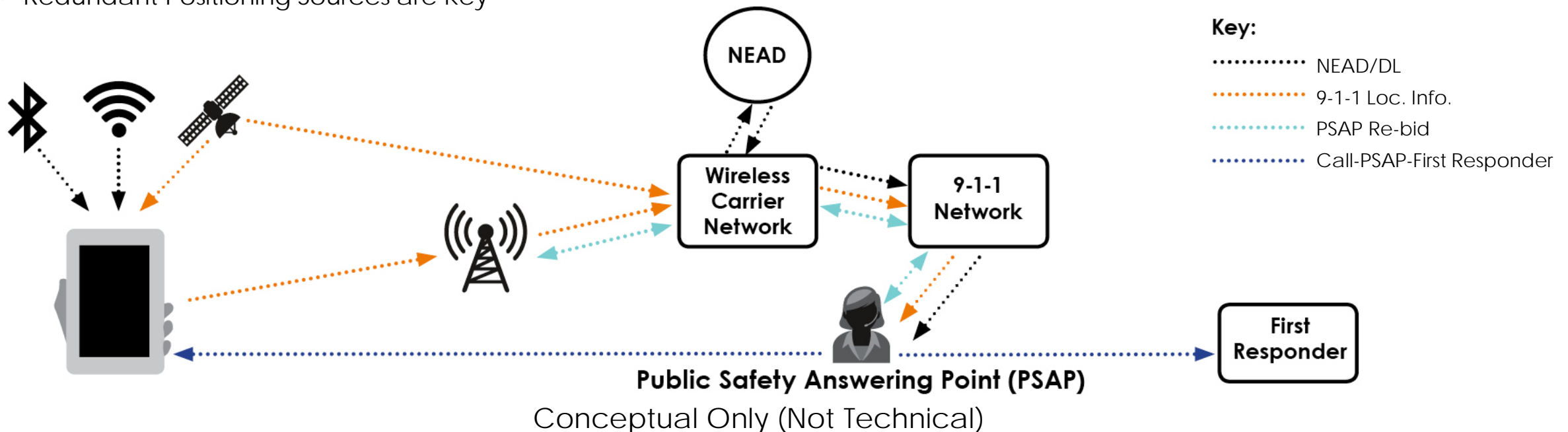
- Leveraging Successful Commercial Methods to Enhance 9-1-1 Location Technologies and Meet the FCC's 50M Horizontal Requirements
- Solving Indoor Location Challenges with Indoor Wireless Location Technologies
- Redundant Positioning Sources are Key

Independently Administered Indoor Test Bed

- Baselines Existing and New Location Technologies Against the 50 M Horizontal Requirement
- Evaluates New Vertical Solutions, such as Z-Axis, and Dispatchable Location

Dispatchable Location

- A National Emergency Address Database (NEAD) of Wi-Fi Access Points and Bluetooth LE Beacons with Street Address Plus Additional Info
- NEAD is an Additional Component to the Existing 9-1-1 System



9-1-1 Location Accuracy Technologies Test Bed LLC



Implementation

- Test Bed LLC Established (June 2015)
- ATIS Selected as Program Manager (September 2015)
- Non-Nationwide Provider Access to Stage 1 Test Data (December 2016)

Key Points

- Regions: Atlanta, GA and San Francisco, CA
- Morphologies per Region: Dense Urban, Urban, Suburban, Rural
- Indoor Testing: 30 Building candidates per Region
- Test Data is Confidential and Proprietary

Results

- Stage 1 – Carrier Compliance Testing Completed (2016) - Tested Existing Carrier Tech Performance Indoors Against the FCC's 50 M Horizontal Req.
- Stage 2 - New and Emerging Technology Testing Completed (2017) – Tested Vendor Solutions Under Stage 1 Parameters
- Stage 3 – New and Emerging Technology Testing - Vendor Solutions Will Be Tested Under Special Considerations
- Stage Z – Test Z-Axis Solutions Indoors to Develop Recommended Z-Axis Metrics for FCC by August 2018
- Dispatchable Location – Functional Test of DL Solutions with NEAD Data

Implementation

- RFP Released (Oct. 2015)
- West Safety Services Selected as Vendor (Oct. 2016)
- NEAD Privacy and Security Plan Provided to the FCC (Feb. 2017)
- First Carrier Progress Reports Provided to FCC (Feb. 2017)
- Second Carrier Progress Reports Due to the FCC (Aug. 2018)
- NEAD Platform Available to Support Wireless 9-1-1 (EY 2018)(*Subject to FCC Approval of NEAD Privacy and Security Plan*)

FCC Reference Point Requirements

- 25% of Population of Top 25 CMAs (April 2021)
- 25% of Population of Top 50 CMAs (April 2023)

FCC Use Restriction

- Wireless Carriers Will Not Use the NEAD or Associated Data for Any Non-911 Purpose, Except as Otherwise Required by Law.

Next Steps in 2017 - 2018

- Continue Indoor Testing of New and Existing Technologies
 - Stage Z, Dispatchable Location, Stages 1 – 3 (continued)
- Operationalize the NEAD
 - FCC Approval of NEAD Privacy & Security Plan
 - Populate the NEAD
 - Test DL
- Education & Outreach
 - Blog: <http://www.ctia.org/industry-data/blog-details/blog-posts/9-1-1-location-accuracy-public-safety-and-consumers>
 - Infographic: <http://www.ctia.org/industry-data/facts-and-infographics-details/fact-and-infographics/getting-9-1-1-location-accuracy-right>

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